

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-CR-10096-JLT
)	
JUDY COLLYMORE)	
)	

SUPPLEMENTAL SENTENCING MEMORANDUM
OF JUDY COLLYMORE

_____The defendant, Judy Collymore, through counsel, Page Kelley, files this memorandum to supplement her original Sentencing Memorandum.

Ms. Collymore was indicted in April, 2004 for conspiracy to import cocaine and importation of cocaine and pled guilty in October, 2005. On February 9, 2006, after a hearing, the Court continued her sentencing to March 5, 2007.

Ms. Collymore now reiterates her original request that when calculating her advisory guideline range under the Sentencing Guidelines, the Court grant her a reduction for her role in the offense and grant her a downward departure on the basis of her extraordinary post-offense rehabilitation. She relies on the argument in her original Sentencing Memorandum concerning the reduction for her role in the offense. With respect to her request for a downward departure for extraordinary post-offense rehabilitation, in the past year Ms. Collymore has demonstrated that she is even more deserving of this departure than she previously was. Since the date she was last before the Court - February 9, 2006 - she has continued to be drug and alcohol free, and has not violated any conditions of her release in any way. She has now been completely substance-free for thirty months.

Ms. Collymore's commitment to sobriety and to helping others through leading NA groups and participating in "outreach" meetings to at-risk groups, outlined in her original Sentencing Memorandum, has continued. She currently attends NA meetings at least five times weekly. She considers the Stairway to Serenity group that meets in the Messiah Baptist Church on Legion Parkway in Brockton to be her "primary" group. She attends that group every Thursday night.

In addition, in the past year Ms. Collymore has successfully attended the Alcoholism/Chemical Dependency Treatment Services Program at the University of Massachusetts Boston, in Plymouth, so that she can become a certified drug counselor. She is presently taking the last two classes that are required, and in May, when she finishes those classes, all that will remain for her to complete the program will be to participate in an internship that will last until August.

Ms. Collymore also again asks the Court to reduce her sentence in light of the factors set out in 18 U.S.C. § 3553. Ms. Collymore is 57 years old. She has one prior offense on her record, a possession of cocaine charge for which she received a continuance without a finding in Roxbury District Court seventeen years ago. She has been on release in this case for three years, and has strikingly demonstrated that she is highly motivated to reform herself. She is at no risk of committing further crimes.

Ms. Collymore still provides essential, daily care for her infirm, 93 year old mother. Her mother requires constant care and is even more dependant today on Ms. Collymore for her daily assistance in eating, dressing, and helping with personal hygiene, than she was before.

Conclusion

Ms. Collymore asks the Court to grant her a downward departure from the applicable advisory guideline range and also asks the Court to reduce her sentence in light of the factors set out in 18 U.S.C. § 3553.

JUDY COLLYMORE

By her attorney,

/s/ Page Kelley

Page Kelley

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Date: February 27, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 27, 2007.

/s/ Page Kelley

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